COMSEARCH

September 9, 2004

Marlene H. Dortch
Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Re: WT Docket No. 02-146

Dear Ms. Dortch:

This letter is filed on behalf of Comsearch, Frequency Finder, and Micronet Communications. Comsearch has been authorized to state that Frequency Finder, Inc. and Micronet Communications, Inc. concur with this filing.

In its *Public Notice* released March 12, 2004, the Commission requested:

> …proposals from commercial entities interested in developing and managing an independent database of site/link registrations by FCC licensees in the 71-76 GHz, 81-86 GHz and 92-95 GHz bands.

All parties represented in this letter filed proposals within the window designated by the Commission.[1] Since that time, representatives of the parties have met and formulated a Joint Proposal that details a registration process where multiple database managers would accept registrations and share data instantaneously. The Joint Proposal is presented for the Commission's review as Attachment A to this letter.

Please contact the referenced parties if you have any questions.

Respectfully Submitted,

COMSEARCH
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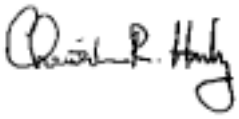
Ashburn, VA 20147



Prepared by:_____
Christopher R. Hardy
Vice President and General Manager

cc: Sandra Danner, Wireless Telecommunications Bureau

[1] Micronet Communications, Inc. filed a proposal on March 25, 2004 and an amendment on April 20, 2004. Comsearch and Frequency Finder, Inc. filed separate proposals on March 26, 2004.

Appendix A: 70-90 GHz Link Registration Process

Developed by: Comsearch, Micronet, and Frequency Finder

As requested by the FCC, Comsearch, Micronet, and Frequency Finder have jointly developed a link registration process that will provide consistency between the database managers (DBMs) for the 70-90 GHz band. In this document, "Licensees" is understood also to include new registrants.

The basic process flow of the link registration process is described in Figure 1. Each of the elements of the process is described below.

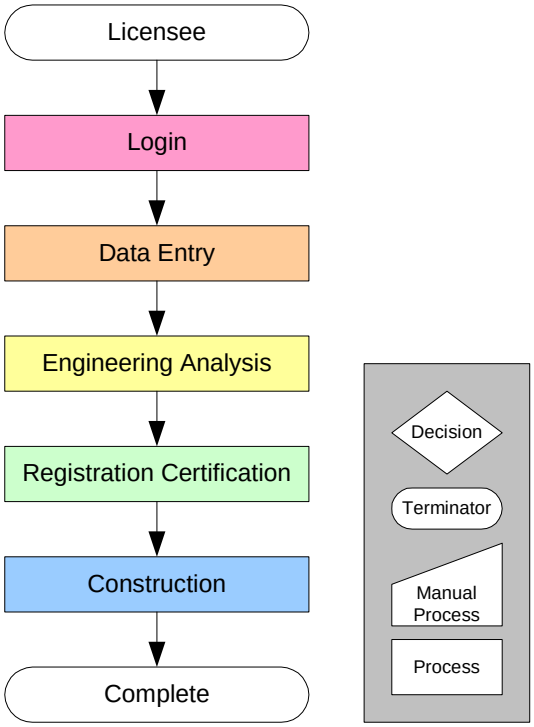


Figure 1: Link Registration Process

1 Web-based Access and Security

A web-based system will provide quick access to data and increase the efficiencies in the registration process. The basic functionality of the web-based access and security is depicted in Figure 2 and would include the following:

- Licensees would obtain a login and password to enter technical parameters for link registration.
    - Licensees, with an authorized call sign assigned by the FCC, request a login and password from any DBM.
    - The DBM contacts the licensee using the contact information on the FCC license to confirm that it is authorized to register links.
    - If a licensee chooses to utilize more than one DBM's database, it would obtain a separate login and password from each DBM's system.
- Each DBM's system will allow users to update administrative and technical information for links that are registered to the licensed operator associated with the login.
- Public access will be provided to query and view the successfully registered link information.
- Permission and security rights will differ between types of users to protect sensitive data. Three categories of Users are envisioned:

Appendix A: 70-90 GHz Link Registration Process

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- Licensees
- Non-licensees
- Regulatory (NTIA/FCC)

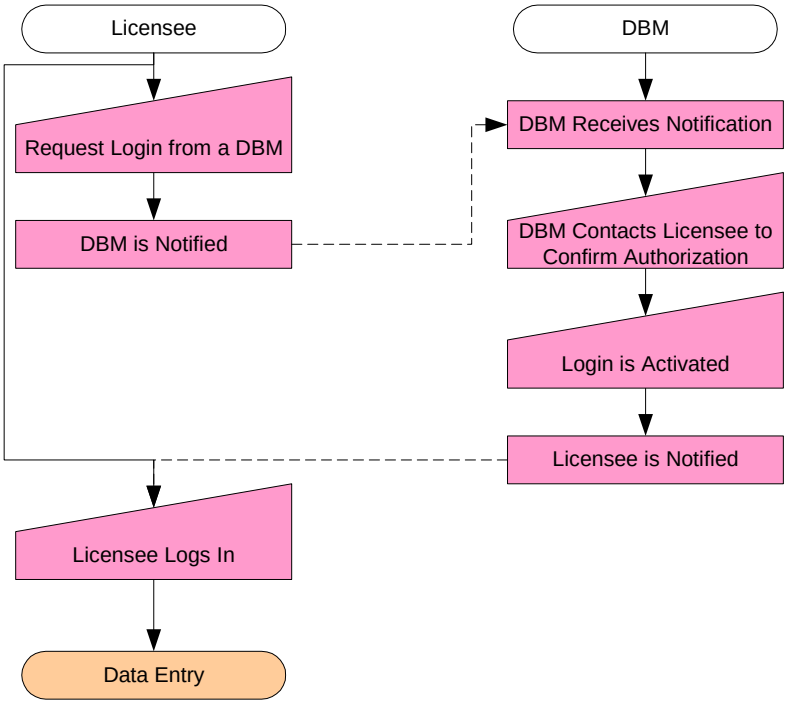

Figure 2: Login Process

2 Data Entry

Licensees are only required to enter the operational parameters of their link with one DBM. Figure 3 shows the process for data entry and engineering analysis.

Licensees enter, at a minimum, the data fields listed on Schedule M of the FCC's Form 601. Other required data fields may differ among DBMs and would be used to perform an interference analysis or file any necessary FCC Form 601 applications.

When entering the link data, the system performs data validation to identify data anomalies and allows the licensee to make corrections. If data validation indicates that the technical parameters do not meet the FCC Rules, the licensee is allowed to either change the data to make the link compliant with the rules, or continue with the data and file for a waiver during the Registration / Certification process.

Appendix A: 70-90 GHz Link Registration Process

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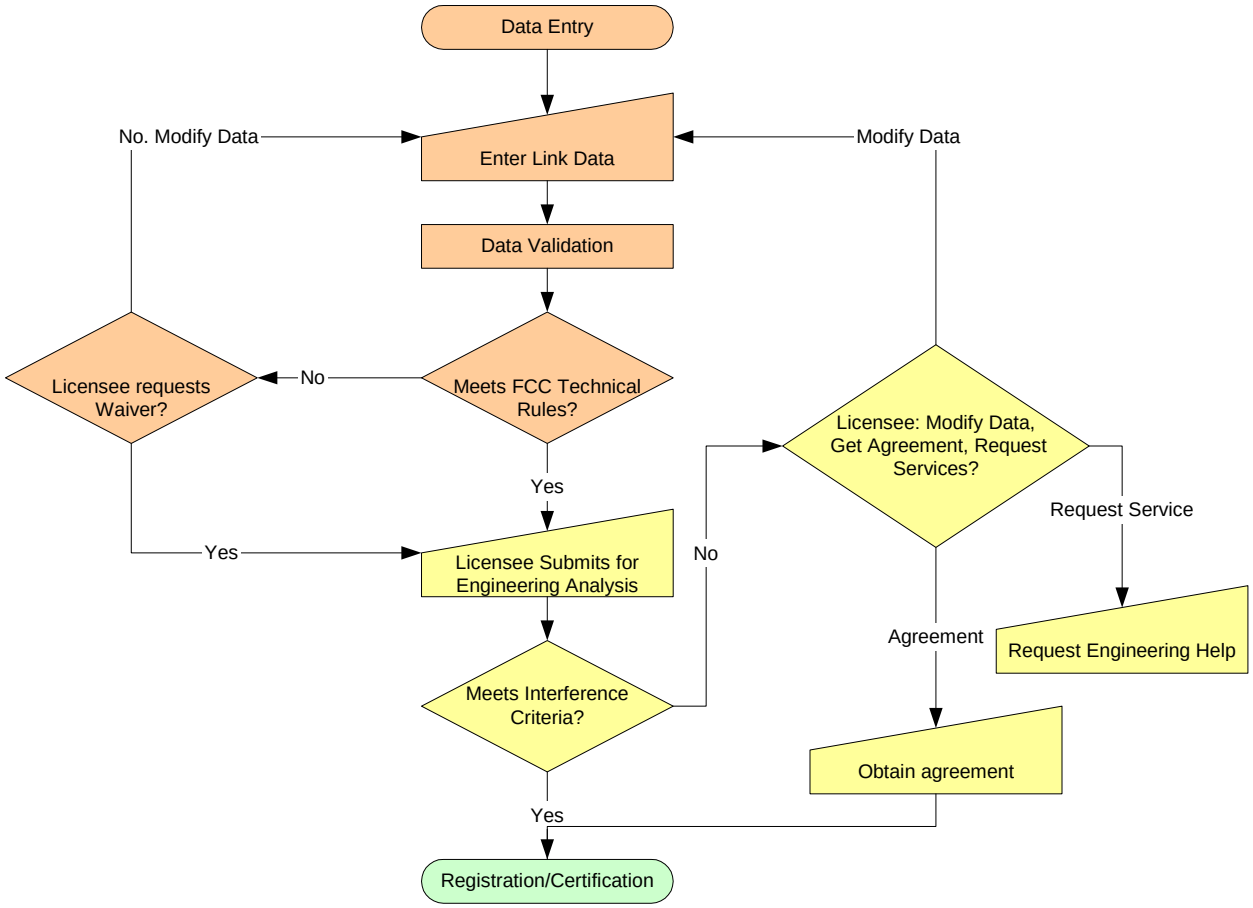

Figure 3: Data Entry and Engineering Analysis

3 Engineering Analysis

Once the link is entered and subsequently accepted for processing, the system performs an engineering analysis that considers all of the previously entered links. It is preferable to follow a standard interference criterion (such as WCA recommendations) so that variations in the results among DBMs are minimal.

If the interference criteria are not met, the licensee may modify the data and perform the analysis again. The licensee may also request additional services from the DBM to resolve interference cases. Lastly, the licensee may pursue an agreement from the affected licensee(s) to accept the interference case(s). Any agreement would not transfer to subsequent modifications of either link.

4 Registration/Certification

The registration process is composed of providing a date/time stamp, exchanging the data with other DBMs, and a certification process that consists of a series of gates that determine whether the FCC needs to process the link individually or whether instant registration is possible. The Registration/Certification process is shown in Figure 4. Please note that the flow chart shows most actions performed in a serial fashion; however, many of them can be carried out simultaneously.

Appendix A: 70-90 GHz Link Registration Process

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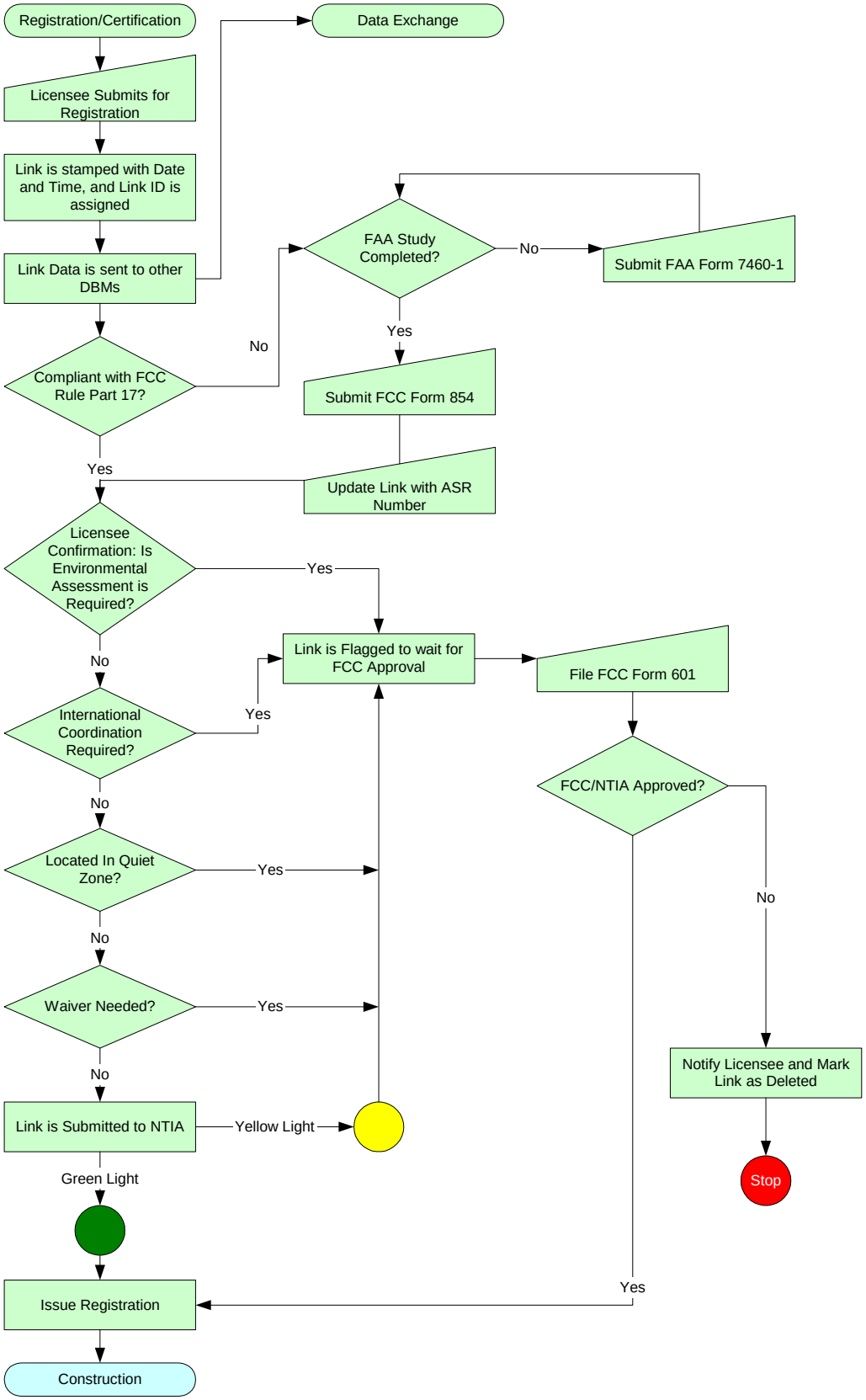

Figure 4: Registration/Certification

Appendix A: 70-90 GHz Link Registration Process

Developed by: Comsearch, Micronet, and Frequency Finder

4.1 Date/Time Stamp

The DBM assigns a link id and the date/time stamp that dictates registration order and interference protection rights. This occurs upon submission of a link for registration.

Greenwich Mean Time is the standard time reference used by each DBM. DBMs will periodically synchronize clocks to maintain precision and consistency between DBMs.

4.2 Data Exchange

Link data will be exchanged between the DBMs and with the FCC and NTIA. The DBMs will develop a process for immediate exchange of data when a new link is submitted for registration and then when subsequent changes are made to the link data. The process will involve exchanging data in a standard file format through a secure protocol. Each DBM will be responsible for transferring the file to other DBMs in a timely fashion (typically within minutes) to prevent a first-in-time link from being omitted from a subsequent analysis.

There may be differences in engineering analysis results among DBMs. If a DBM does not agree with another's results, they will work together cooperatively to resolve the interference case. Initially, the DBM predicting interference will send an objection through email directly to the DBM through which the link was registered. The receiving DBM has five business days to respond to the objection.

Each DBM will allow other DBMs, NTIA and FCC to download their database at any time for comparison purposes. The downloaded file will be in a consistent format across DBMs.

4.3 Certification

A link is considered registered if NTIA approval is received and it passes through a series of checks: environmental assessment, international coordination, quiet zone, and ASR registration, and waiver assessment. If any of these requirements are not met, a FCC Form 601 or other required form would need to be filed and granted prior to completing the registration process. The link will not lose its first-in-time status but will be placed in a pending mode until resolved.

Licensees can go directly to the NTIA for incumbent federal interference checking and protection against further federal government registrations or allow the DBM to obtain approval on their behalf. We recommend the latter in order to assign the data/time stamp faster and to avoid duplicate entry and potential data errors.

The FCC will send to the DBM all final actions on waivers, international coordination, quiet zone, environmental assessment and NTIA approval through an automated process. The DBM will update the databases to reflect the grant or denial of the waiver.

5 Construction

Licensees are required to construct within a FCC-regulated period from the registration completion date. Figure 5 shows the Construction Process.

Licensees must update the status of a link from 'Registered' to 'Registered and Constructed'. When doing so, licensee must certify that the construction of the link is completed according to the parameters registered in the database. If the status is not changed within the required construction period, the link is no longer protected from interference and is archived in all databases.

Appendix A: 70-90 GHz Link Registration Process

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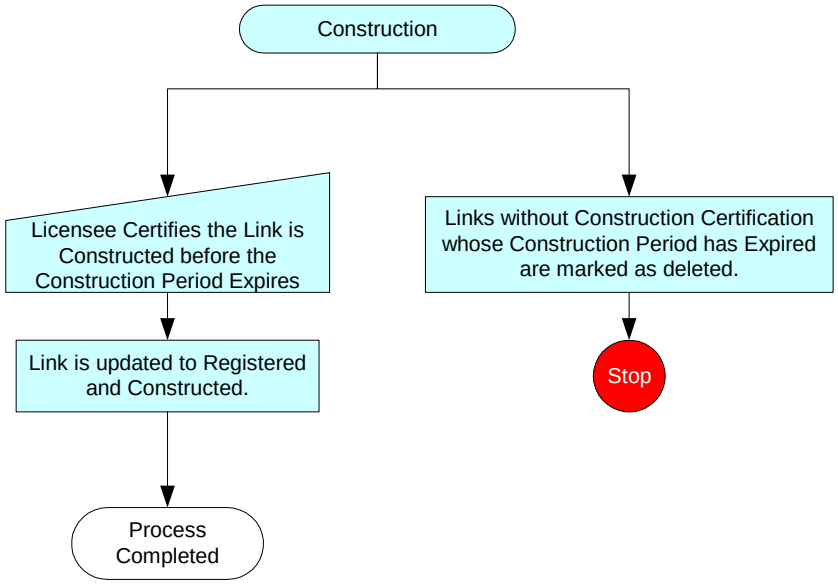

Figure 5: Construction Process

The FCC may approve extensions to the construction deadline and will so notify DBMs. A modification to a licensed link would restart the construction deadline. The DBMs note that, under these rules, spectrum warehousing is a possibility and recommend that the FCC publish a warning that spectrum warehousing is prohibited. They agree to cooperate to identify and deal with spectrum warehousing.

6 Modifications and Deletions

Licensees can delete their own links through any DBM's system. An archive history of all deletions will be maintained by the DBMs. Once a link is deleted, a notification email is sent to the licensee, preventing fraudulent deletions.

Any technical changes to a registered or constructed link will be considered a new registration that will reset the date/time stamp. Status and administrative changes will not affect the date/time stamp.

The original link will be protected until the new link is constructed. This will allow the licensee to operate with the original facilities until the modified facilities are constructed and operational.

7 Interference Mediation

When a licensee experiences interference into a link, the licensee contacts a DBM. If the licensee registered the link with a different DBM, the DBM can decide to handle the interference case or refer them to the DBM that registered the link. The DBM will provide a radial search of other links in the vicinity along with the first-in-time status. The complaining licensee can evaluate the list to determine if a second-in-time link is potentially causing the interference. If on-site field verification is necessary to identify the cause of the interference, the licensee may obtain that service from a service provider at an additional fee.

Appendix A: 70-90 GHz Link Registration Process

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If a licensee identifies the potential interfering link, they notify the DBM who then contacts the licensee of the interfering link. The purpose of the contact is to communicate the problem and bring the two licensees together to resolve the interference.

8 Transfer of Assignment

There are two types of assignments between licensees: transfer of an entire Call Sign (national license); and transfer of subset of links. The FCC will approve transfers of a Call Sign and notify DBMs of action taken. The FCC will regularly provide the DBMs with updated call sign information in order to account for new licensees in the database. In cases where a licensee assigns subsets or individual links to another licensee, the assigning licensee would request update through one DBM to assign those links to the new licensee.

9 Data Query

Each DBM will provide access to search its database on a read only basis. At a minimum, all relevant parameters on Schedule M would be viewable for an individual record.

10 Time Frame

All database managers expect to launch their databases by February 1, 2005.